

Kelly H. Dove, Esq.  
Nevada Bar No. 10569  
SNELL & WILMER L.L.P.  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
Telephone: 702.784.5200  
Facsimile: 702.784.5252  
[kdove@swlaw.com](mailto:kdove@swlaw.com)

Christopher J. Cox (*pro hac vice*)  
Tej Singh (*pro hac vice*)  
HOGAN LOVELLS  
4085 Campbell Avenue, Suite 100  
Menlo Park, CA 94025  
Telephone: (650) 463-4000  
Facsimile: (650) 463-4199  
[chris.cox@hoganlovells.com](mailto:chris.cox@hoganlovells.com)  
[tej.singh@hoganlovells.com](mailto:tej.singh@hoganlovells.com)

Helen Y. Trac (*pro hac vice*)  
HOGAN LOVELLS  
3 Embarcadero Center, 15th Floor  
San Francisco, California 94111  
Telephone: 415.374.2300  
Facsimile: 415.374.2499  
[helen.trac@hoganlovells.com](mailto:helen.trac@hoganlovells.com)

*Attorneys for Defendants*  
RUAG Ammotec GmbH, RUAG Hungarian  
Ammotec, Inc., and RUAG Holding AG

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ARCHON FIREARMS, INC., a domestic  
corporation,  
Plaintiff,

v.

RUAG AMMOTEC GMBH, a foreign  
company; RUAG HUNGARIAN  
AMMOTEC, INC., a foreign company;  
RUAG AMMOTEC USA, INC., a foreign  
company; RUAG SCHWEIZ AG, a foreign  
company; RUAG HOLDING AG, a foreign  
company; RUAG AMMOTEC  
MAGYARORSZAGI ZRT., a foreign  
company; ARSENAL FIREARMS LTD., a  
foreign company; AF PRO TECH GROUP  
KFT, a foreign company; ARSENAL  
FIREARMS USA, LLC; DOE  
INDIVIDUALS I-X; and ROE  
CORPORATIONS I-X, inclusive,

Defendant(s).

Case No.: 2:20-cv-00227-GMN-NJK

**JOINT MOTION FOR EXTENSION  
OF TIME**

**(First Request)**

1 Plaintiff Archon Firearms, Inc. (“Plaintiff”) and Defendants RUAG Ammotec GmbH,  
2 RUAG Hungarian Ammotec, Inc., and RUAG Holding AG (collectively, “RUAG” and collectively  
3 with Plaintiff, the “Parties”), by and through their undersigned counsel, for good cause shown,  
4 hereby jointly request and agree as follows:

- 5 1. RUAG Ammotec GmbH filed a Motion to Dismiss or Stay the Action and Compel  
6 Arbitration, or in the Alternative, Motion to Dismiss the Complaint for Failure to State a  
7 Claim (Fed. R. Civ. P. 12(b)(6)) on February 13, 2020 [ECF Nos. 7] (“Motion to Dismiss”).
  - 8 2. RUAG Ammotec GmbH filed a Motion to Dismiss or Stay the Action and Compel  
9 Arbitration, or in the Alternative, Motion to Dismiss the Complaint for Failure to State a  
10 Claim (Fed. R. Civ. P. 12(b)(6)) on February 13, 2020 [ECF Nos. 8] (“Motion to Compel  
11 Arbitration”).
  - 12 3. RUAG Hungarian Ammotec, Inc., and RUAG Holding AG filed a Motion to Dismiss for  
13 Lack of Personal Jurisdiction on February 13, 2020 [ECF No. 10] (“Personal Jurisdiction  
14 Motion to Dismiss” and collectively with the Motion to Dismiss and Motion to Compel, the  
15 “Motions”).
  - 16 4. On March 5, 2020, Plaintiff filed a First Amended Complaint [ECF no. 39].
  - 17 5. Plaintiff filed an Opposition to the Motion to Dismiss [7] and Motion to Compel Arbitration  
18 [8] [ECF No. 40] on March 5, 2020.
  - 19 6. Plaintiff also filed an Opposition to the Personal Jurisdiction Motion to Dismiss [ECF No.  
20 41] on March 5, 2020 (“Plaintiff’s Opposition”).
  - 21 7. Due to technical difficulties, Plaintiff was unable to file the exhibits referenced in Plaintiff’s  
22 Opposition and the declaration attached thereto (the “Exhibits”), on March 5, 2020.
  - 23 8. Plaintiff informally provided RUAG the Exhibits in support of Plaintiff’s on March 6, 2020  
24 via email.
- 25  
26  
27  
28

- 1 9. Plaintiff represents that it will file the updated version of Plaintiff's Opposition reflecting
- 2 citation to those Exhibits<sup>1</sup> and the Exhibits no later than close of business Thursday, March
- 3 12, 2020.
- 4 10. RUAG will not object to Plaintiff's filing the updated version of Plaintiff's Opposition and
- 5 the Exhibits under those conditions..
- 6 11. RUAG's Replies in Support of the Motions are currently due March 12, 2020.
- 7 12. In light of Plaintiff's filing a First Amended Complaint, Plaintiff and RUAG Ammotech
- 8 GmbH agree that the Motion to Dismiss [ECF No. 7] and Motion to Compel Arbitration
- 9 [ECF No. 8] will be withdrawn *without prejudice*.
- 10 13. Plaintiff and RUAG Ammotech GmbH agree that RUAG Ammotech GmbH may have until
- 11 March 23, 2020 to respond to the First Amended Complaint.
- 12 14. Further, Plaintiff and RUAG agree that RUAG's Reply in Support of the Personal
- 13 Jurisdiction Motion to Dismiss will be extended to Monday, March 16, 2020.
- 14 15. This modest extension for filing the Reply – from Thursday, March 12, 2020 to Monday,
- 15 March 16, 2020 – is needed to allow RUAG Hungarian Ammotec, Inc., and RUAG Holding
- 16 AG to fully prepare its Reply, particularly in light of the slight delay in receiving exhibits.
- 17 Likewise, the modest extension for responding to the Amended Complaint – from Thursday,
- 18 March 19, 2020 to Monday, March 23, 2020 is needed and appropriate as RUAG has agreed
- 19 to withdraw two of the complex Motions it filed in response to the original Complaint and
- 20 requires additional time to evaluate and prepare a new response to the First Amended
- 21 Complaint.
- 22 16. Nothing in this Joint Motion, including RUAG's withdrawal of the Motion to Dismiss and
- 23 Motion to Compel Arbitration, is intended to waive the parties' claims or defenses.
- 24 17. This request is sought in good faith and is not made for the purpose of delay.
- 25
- 26
- 27

---

<sup>1</sup> In other words, the Opposition will be the same in all respects, except that it will include citations to the as-filed Exhibits.

DATED: March 12, 2020

LAW OFFICE OF HAYES & WELSH

By: /s/ Larson A. Welsh

Larson A. Welsh, Esq.  
Nevada Bar No. 12517  
199 N. Arroyo Grande Blvd., Suite 200  
Henderson, Nevada 89074

Jeffrey A. DiLazzero, Esq.  
975 Bridgeton Pike, Suites A & D  
Sewell, NJ 08080

*Attorneys for Plaintiff Archon Firearms,  
Inc.*

DATED: March 12, 2020

SNELL & WILMER L.L.P.

By: /s/ Kelly H. Dove

Kelly H. Dove, Esq.  
Nevada Bar No. 10569  
3883 Howard Hughes Parkway, Suite  
1100  
Las Vegas, Nevada 89169

Christopher J. Cox (*pro hac vice*)  
Tej Singh (*pro hac vice*)  
4085 Campbell Avenue, Suite 100  
Menlo Park, CA 94025  
Telephone: (650) 463-4000  
Facsimile: (650) 463-4199  
chris.cox@hoganlovells.com  
tej.singh@hoganlovells.com

Helen Y. Trac (*pro hac vice*)  
3 Embarcadero Center, 15th Floor  
San Francisco, California 94111  
Telephone: 415.374.2300  
Facsimile: 415.374.2499  
helen.trac@hoganlovells.com

*Attorneys for Defendants  
RUAG Ammotec GmbH, RUAG  
Hungarian Ammotec, Inc., and RUAG  
Holding AG*

# **ORDER**

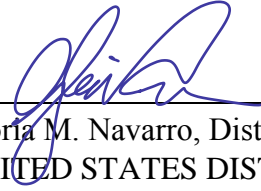
**IT IS HEREBY ORDERED** that the above Joint Motion for Extension of Time, (ECF No. 44), is **GRANTED**.

**IT IS FURTHER ORDERED** that the RUAG Ammotec GMBH's Motion to Dismiss, (ECF No. 7), and Motion to Compel Arbitration, (ECF No. 8), are **WITHDRAWN without prejudice**.

**IT IS FURTHER ORDERED** that RUAG Ammotec GmbH shall have until March 23, 2020, to respond to the First Amended Complaint.

**IT IS FURTHER ORDERED** that RUAG Holding AG and RUAG Hungarian Ammotec, Inc. shall have until March 16, 2020, to reply in support of their Motion to Dismiss, (ECF No. 10).

**DATED** this 16 day of March, 2020.

  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME** by method indicated below:

☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).

☒ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

Jeffrey A. Dilazzero, Esq.  
975 Bridgeton Pike, Suites A & D  
Sewell, NJ 08080  
*Attorneys for Plaintiff Archon Firearms,  
Inc.*

☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

☐ **BY PERSONAL DELIVERY:** by causing personal delivery by \_\_\_\_\_, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.

☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

DATED this 12th day of March, 2020.

/s/ Maricris Williams  
An employee of SNELL & WILMER L.L.P.

4849-8011-3847.1